

*[Submitting Counsel on Signature Page]*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**PLAINTIFFS' AND TIKTOK  
DEFENDANTS' JOINT TEMPORARY  
SEALING MOTION (JOINT LETTER  
BRIEF REGARDING THE SCOPE OF  
DISCOVERY ABOUT THE "TIKTOK  
PLATFORM")**

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs and Defendants TikTok, Ltd., TikTok, LLC, TikTok, Inc., ByteDance Ltd., and ByteDance Inc.'s (collectively referred to in this submission as "TikTok Defendants," and with Plaintiffs as the "Parties") file the instant Joint Temporary Sealing Motion requesting to file under seal limited portions of the Parties' Joint Letter Brief Regarding the Scope of Discovery About the "TikTok Platform." The reasons for sealing will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Party Information
Dkt. 801-1	Joint Letter Brief Regarding the Scope of Discovery About the "TikTok Platform" (Sealed)	The document contains information designated as confidential by the TikTok Defendants.

Dated: May 1, 2024

Respectfully submitted,

/s/ Lexi J. Hazam  
 LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
 BERNSTEIN, LLP**  
 275 Battery Street, 29<sup>th</sup> Floor  
 San Francisco, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
 401 9th Street NW Suite 630  
 Washington DC 20004  
 Telephone: 202-386-9610  
 pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
 55 Challenger Road, 6<sup>th</sup> floor  
 Ridgefield Park, NJ 07660  
 Telephone: 973-639-9100  
 Facsimile: 973-679-8656  
 cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement  
Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
234 Commerce Street  
Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

PAIGE BOLDT  
**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112

Telephone: 816-701 1100  
tcartmell@wcllp.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100  
Louisville, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**  
17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

HILLARY NAPPI

**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, P.C.**  
1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street  
Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

MELISSA YEATES  
JOSEPH H. MELTZER  
**KESSLER TOPAZ MELTZER & CHECK, LLP**  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

*Attorneys for Plaintiffs*

/s/ Andrea R. Pierson  
Andrea Roberts Pierson, *pro hac vice*  
andrea.pierson@faegredrinker.com  
Amy Fiterman, *pro hac vice*  
amy.fiterman@faegredrinker.com  
Faegre Drinker LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300  
Facsimile: +1 (317) 237-1000

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake  
Geoffrey M. Drake, *pro hac vice*  
gdrake@kslaw.com  
David Mattern, *pro hac vice*  
dmattern@kslaw.com  
King & Spalding LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: + 1 (404) 572-4600  
Facsimile: + 1 (404) 572-5100  
*Attorneys for Defendants TikTok Inc., ByteDance  
Inc., ByteDance Ltd., TikTok Ltd., and TikTok,  
LLC*

**ATTESTATION**

I, Andre Mura, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 1, 2024

By: /s/ Andre M. Mura

Andre M. Mura